



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HE-12

24 SEP 1987

US EPA RECORDS CENTER REGION 5



1004604

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dennis Drake, Chief
Compliance Enforcement Section
Waste Management Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Dear Mr. Drake:

The purpose of this letter is to forward six files which contain financial information which was claimed to be confidential business information under 40 CFR 260.2(b). Since the Michigan Department of Natural Resources (MDNR) received authorization for the financial responsibility requirements of 40 CFR Part 264 and 265 on October 30, 1986, we are transferring the original documents for use in your reviews.

The six files being forwarded are as follows:

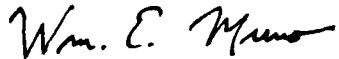
- | | |
|--|-----------------|
| 1. BASF Corporation (Holland, MI) | MID 006 411 953 |
| 2. BASF Corporation (Holland, MI) | MID 048 223 986 |
| 3. BASF Corporation (Troy, MI) | MID 057 007 478 |
| 4. BASF Corporation (Wyandotte, MI) | MID 064 197 742 |
| 5. CIBA-GEIGY Corp. (East Lansing, MI) | MID 067 352 989 |
| 6. Michigan Waste Systems (Wayne, MI) | MID 000 810 408 |
| - Woodland Meadows Landfill | |

Except for letters of credit, these six files complete the transfer of financial responsibility documents to MDNR. Because the Regional Administration is named as the benefactor in letters of credit, it was previously agreed that letters of credit would be handled individually with each lending institution. Copies of these letters of credit were forwarded

to the MDNR on March 13, 1987. Region V is to retain the originals until the MDNR contacts the lending institutions and informs Region V as to the appropriate procedure for transferring each letter of credit.

If you have any questions, please contact Ronald Brown of my staff at (312) 886-4463.

Sincerely yours,

A handwritten signature in cursive script, reading "Wm. E. Muno".

William E. Muno, Chief
RCRA Enforcement Section

Enclosures

cc: Alan Howard

BASF Wyandotte Corporation



100 Cherry Hill Road
P.O. Box 181
Parsippany, N.J. 07054
201/263-5280

Keith Fry
Director
Corporate Environmental Protection

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P35 1210494

December 10, 1985

Mr. Thomas Golz
U.S.E.P.E. Region V
230 South Dearborn
Chicago, Illinois 60604

Re: Hazardous Waste Storage Facility Liability Requirements

Dear Mr. Golz:

For the calendar year 1985, BASF Wyandotte Corporation (BASF) obtained the required liability insurance for its facility in Wyandotte, Michigan, (EPA ID Number MID 064197742).

Copies of the liability certificates were submitted to your attention in a letter from me dated 7 February 1985. This policy will not be renewed beyond 31 December 1985.

For the calendar year 1986, BASF will meet these liability requirements by passing the financial test as specified in 40 CFR 265 Subpart H.

A report demonstrating compliance with this financial test will be submitted within 90 days of the end of BASF's fiscal year; before 31 March 1986.

Very truly yours,

BASF WYANDOTTE CORPORATION


K. Fry

/cir

cc: A. D. Gillen
H. D. Roush

RECEIVED

DEC 13 1985

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
Hazardous Waste Management Board

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
CAROLLO
B A HOEFER
HEN F MONSMA
HILARY F SNELL
PAUL H WENDLER
HARRY H WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O SKOOG, Director

June 17, 1985

BASF Wyandotte
1609 Biddle Avenue
Wyandotte, MI 48192
Attn: H.D. Roush, Manager
Environmental Protection

RE: MID 064197742

Dear Mr. Roush:

The Hazardous Waste Division has received your closure plan for the facility located at the above address. Based on review of the closure plan, the following deficiencies were noted:

1. The financial assurance mechanism for closure was not provided as required by 40 CFR §265.143.
2. The liability requirements for sudden and non-sudden accidental occurrences as required by 40 CFR §265.147 were not provided.

You are requested to respond to this letter by July 10, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Damrel".

Kenneth L. Damrel
Environmental Engineer
HAZARDOUS WASTE DIVISION

KD:jg

cc: U.S. EPA, Region V
B. Okwumabua

BASF Wyandotte Corporation



100 Cherry Hill Road
P.O. Box 121
Parsippany, NJ 07054
201 92-6280

Certified Mail
P35-1215166
Return Receipt Requested

April 28, 1983

Keith Fry,
Director
Superior Environmental Protection

EPA Region V
Hazardous Waste Program,
Liability Insurance
111 Jackson Boulevard
18th Floor
Chicago, IL 60604

RE: Liability Insurance for Hazardous Waste Treatment, Storage,
and Disposal Facilities

Gentlemen:

BASF Wyandotte Corporation (BWC) owns and operates 4 hazardous waste treatment, storage, and disposal facilities in Region V. These facilities are located in Wyandotte, MI (EPA ID Number MID 064197742); Troy, MI (EPA ID Number MID 057007478); and Holland, MI (EPA ID Numbers MID 048223986, and MID 006411953). BWC has obtained liability insurance for sudden and accidental occurrences for these sites as required in 40 CFR 264.147. BWC hereby submits to Region V, originally signed copies of the liability certificate.

Should you have any questions on this matter, please contact me.

Very truly yours,

BASF WYANDOTTE CORPORATION

Keith Fry
Keith Fry

jc
cc: recipients

RECEIVED

WASTE MANAGEMENT

bms 12/30/83
s/b 265.147
for I.S.
Facility

HAZARDOUS WASTE FACILITY
CERTIFICATE OF LIABILITY INSURANCE

1. Name of Insurer: Insurance Company of North America
Address of Insurer: 127 John Street
New York, New York 10038

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

Name of Insured: BASF Wyandotte Corporation
Address of Insured: 100 Cherry Hill Road
Parsippany, New Jersey 07054

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (Various Locations - See Below) for " nonsudden accidental occurrences." The limits of liability are \$3,000,000 each occurrence and \$6,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PLI 1127 issued on 1-15-83. The effective date of said policy is 1-15-83.

2. The insurer further certifies the following with respect to the insurance described in Paragraph 1:


- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
- (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

SCHEDULE

<u>Name of Facility</u>	<u>Address or Location</u>	<u>EPA Identification Number</u>
Holland	471 Howard Avenue Holland, MI.	MID048223986



Authorized Representative & Title
Assistant Vice President
(Type Name) D. Robert Filoramo

Name of Insurer Insurance Company of North America
127 John Street
Address of Insurer New York, New York 10038

ENVIRONMENTAL WASTE FACILITY CERTIFICATE OF INSURANCE

THE HARTFORD

1. The Hartford Fire Insurance Company, (the Insurer) of Hartford Plaza, Hartford, Connecticut 06115 hereby certifies that it has issued liability insurance covering bodily injury and property damage to BASF Wyandotte Corporation & BASF Systems Corporation, (the insured) of 100 Cherry Hill Road, Parsippany, NJ 07054 in connection with the insured's obligation to demonstrate financial responsibility tender to 40 CFR 264.147 or 265.147. The coverage applies at:

EPA Identification Number: NJD 005377266

Name: BASF Wyandotte Corporation - Parsippany

Address: 100 Cherry Hill Road Parsippany, NJ 07054

(see over)

for sudden and accidental occurrences. The limits of liability are \$ 1,000,000 each occurrence and \$ 2,000,000 annual aggregate, inclusive of legal defense costs.

(see over)

The coverage is provided under Policy Number 10 CLR P23909E, issued on 1/1/83. The effective date of said policy is 1/1/83.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer or the insured will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
 - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days

... as an excess or
surplus lines insurer, in one or more States.

Elizabeth Caliendo
Signature of Authorized Representative of Insurer)

Elizabeth Caliendo
(Type Name)

Account Supervisor Authorized Representative of Hartford Fire Insurance Company
(Title) (Name of Insurer)

123 William Street New York, NY 10038
(Address of Representative)

4. Locations being certified:

2. EPA ID# WVD 00063601
Name: BASF Wyandotte Corporation - Huntington
Add.: 24th Street & 5th Avenue
Huntington, WV 25722

5. Limits of Liability being certified to:

Bodily Injury 2,000,000 each occurrence
Property Damage 1,000,000 each occurrence
2,000,000 aggregate

The above limits are exclusive of defense costs.

LOCATIONS BEING CERTIFIED:

3. EPA ID# MSD 049117575
Name: BASF Wyandotte Corporation - Greenville
Addr.: 103 BASF Road
Greenville, MS 38701
4. EPA ID# NJD 000768275
Name: BASF Wyandotte Corporation - Fairfield
Addr.: 140 New Dutch Lane
Fairfield, NJ 07006
5. EPA ID# NJD 003000049
Name: BASF Wyandotte Corporation - Washington
Addr.: P. O. Box 232
Parsippany & Pleasantview Avenue
Washington, NJ 07882
6. EPA ID# MID 048223986
Name: BASF Wyandotte Corporation - Holland
Addr.: 471 Howard Avenue
Holland, MI
7. EPA ID# MID 006411953
Name: BASF Wyandotte Corporation - Holland
Addr.: 491 Columbia Avenue
Holland, MI 49423
8. EPA ID# NJD 044132447
Name: BASF Wyandotte Corporation - Carlstadt
Addr.: 585 Industrial Road
Carlstadt, NJ 07072
9. EPA ID# MID 064197742
Name: BASF Wyandotte Corporation - Wyandotte General (See Schedule)
Addr.: 1609 Biddle Avenue
Wyandotte, MI 48192

Wyandotte Polyol
Wyandotte Vitamin A
Wyandotte Vitamin E
Wyandotte TIO
Wyandotte HPCH
Addr.: 1609 Biddle Avenue
Wyandotte, MI 48192
10. EPA ID# MID 057007478
Name: BASF Wyandotte Corporation - Troy
Addr.: 1700 Blaney Drive
Troy, MI 48084

11. EPA ID# SC0 077990638
Name: BASF Wyandotte Corporation - Whitestone
Addr: Box 2108
Cayltonburg, SC 29302
12. EPA ID# SC0 003149705
Name: BASF Wyandotte Corporation - Charlotte
Addr: 4330 Chesapeake Drive
Charlotte, SC 28208
13. EPA ID# CA0 000611647
Name: BASF Wyandotte Corporation - Dinuba
Addr: 10181 Avenue 416
Dinuba, CA 93618
14. EPA ID# LA0 040776809
Name: BASF Wyandotte Corporation - Geismar General (See Schedule)
Addr: River Road
Geismar, LA 70734
- Geismar Bassagran
Geismar Polyols
Geismar TDI
Geismar NDI
Geismar EO/EG
Geismar Butanediol
Geismar THF
Geismar Electrol
- Addr: River Road
Geismar, LA 70734
15. EPA ID# NYD 093249688
Name: BASF Wyandotte Corporation - Rensselaer
Addr: Riverview Avenue
Rensselaer, NY 12144
16. EPA ID# NJD 078247905
Name: BASF Wyandotte Corporation - South Brunswick
Addr: Cranbury & South River Road
South Brunswick, NJ 08831

MID 064 197742

BASF Wyandotte Corporation



100 Cherry Hill Road
P.O. Box 181
Parsippany, N.J. 07054
201/263-5280

Keith Fry
Director
Corporate Environmental Protection

Certified Mail
P357-290-879
Return Receipt Requested

January 13, 1983

Regional Administrator - Region V
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

Re: Liability Insurance Requirements
for Hazardous Waste Treatment,
Storage and Disposal Facilities

Gentlemen:

BASF Wyandotte Corporation (BWC) is the owner and operator of hazardous waste treatment, storage and disposal facilities pursuant to Notifications and Part A applications previously filed. BWC hereby submits the appropriate documentation for liability coverage for sudden accidental occurrences as specified in 40 CFR § 264.147 or 265.147. The EPA I.D. numbers for all BWC TSD facilities are included in this documentation.

Should you have any questions regarding this matter, please contact me.

Very truly yours,

BASF WYANDOTTE CORPORATION

Keith Fry
Keith Fry

jc
attachment

cc: Department of Natural Resources
Resource Recovery Division
PO Box 30028
Lansing, MI 48909

RECEIVED

JAN 18 1983

WASTE MANAGEMENT BRANCH
EPA. REGION V

BASF Wyandotte Corporation

Certified Mail #P29 2144623
Return Receipt Requested

BASF



100 Cherry Hill Road
P.O. Box 181
Parsippany, N.J. 07054
201/263-5280

Keith Fry
Director
Corporate Environmental Protection

July 13, 1982

Regional Administrator - Region V
U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Re: Liability Insurance Requirements for
Hazardous Waste Treatment, Storage and
Disposal Facilities

Gentlemen:

BASF Wyandotte Corporation (BWC) is the owner and operator of hazardous waste treatment, storage and disposal facilities pursuant to Notifications and Part A applications previously filed. BWC hereby submits the appropriate documentation for liability coverage for sudden accidental occurrences as specified in 40 CFR §265.147. The EPA I.D. numbers for all BWC TSD facilities are included in this documentation.

Should you have any questions regarding this matter, please contact me.

Yours very truly,

BASF WYANDOTTE CORPORATION

Keith Fry
Keith Fry

:ff
Attachment

cc: Department of Natural Resources
Resource Recovery Division
P.O. Box 30028
Lansing, Michigan 48909



THE HARTFORD

Named Insured and Address

Policy Number

10 CLR P23003E

This endorsement forms a part of the policy as numbered above, issued by THE HARTFORD INSURANCE GROUP company designated therein, and takes effect as of the effective date of said policy unless another effective date is stated herein.

Effective Date

1-1-82

Effective hour is the same as stated in the Declarations of the policy.

Endt. No.

BASF Wyandotte Corporation
BASF Systems Corporation
100 Cherry Hill Road
Parsippany, NJ 07054

Schedule Accompanying Form L 4492-0

Wyandotte Polyol

Wyandotte Vitamin A

Wyandotte Vitamin E

Wyandotte TIO

Wyandotte HPCH

Address: 1609 Biddle Avenue
Wyandotte, MI 48192

EPA ID#: MID 064197742

Nothing herein contained shall be held to vary, waive, alter, or extend any of the terms, conditions, agreements or declarations of the policy, other than as herein stated.

This endorsement shall not be binding unless countersigned by a duly authorized agent of the company; provided that if this endorsement takes effect as of the effective date of the policy and, at issue of said policy, forms a part thereof, countersignature on the declarations page of said policy by a duly authorized agent of the company shall constitute valid countersignature of this endorsement.

AMENDATORY ENDORSEMENT POLLUTION LIABILITY



THE HARTFORD

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following
COMPREHENSIVE GENERAL LIABILITY INSURANCE
COMPREHENSIVE — PLUS SPECIAL GENERAL LIABILITY INSURANCE
SMP LIABILITY INSURANCE

Premium for This Endorsement Subject to Audit

Part I Separate Limits of Liability Endorsement (Hazardous Waste Facility)

It is agreed that:

1. The limits of liability stated in the Hazardous Waste Facility Pollution Liability Endorsement in Part II apply separately to such insurance as is afforded by the policy in connection with the insured's obligation to demonstrate financial responsibility at the facilities described therein.
2. Such limits of liability apply collectively to all such facilities (and not separately to each) and are in lieu of and not in addition to any other limits of liability stated elsewhere in the policy.
3. The "each occurrence" limit applies to all bodily injury and all property damage arising out of a single occurrence.
4. The annual "aggregate" limit applies to all damages because of all bodily injury and all property damage which occurs during the policy period.
5. For the purpose of determining the limit of the company's liability, all bodily injury and property damage arising out of a sudden and accidental discharge, dispersal, release or escape of irritants, contaminants or pollutants, including all bodily injury and property damage arising out of all subsequent exposure of persons or property to such substances, shall be considered as arising out of a single occurrence.
6. Part I of this endorsement shall be cancelled automatically by cancellation of the Hazardous Waste Facility Pollution Liability Endorsement in Part II.

Part II Hazardous Waste Facility Pollution Liability Endorsement

1. This endorsement certifies that the policy to which the endorsement is attached provides pollution liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA Identification Number MD 048223986
Name: BASF Wyandotte Corporation - Holland
Address: 471 Howard Avenue, Holland, MI
for sudden accidental occurrences. The limits of liability are \$ 1,000,000 "each occurrence" and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.
2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of the Paragraph 2 are hereby amended to conform with subsections (a) through (e):
 - (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of this endorsement, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
 - (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

Attached to and forming part of Policy No. 10 CLR P23903E
issued by Hartford Accident & Indemnity Company, herein called the Insurer,
(Name of Insurer) BASF Wyandotte Corporation &
of 123 William Street New York, NY 10038 to BASF Systems Corporation
(Address of Insurer) (Name of Insured)
of 100 Cherry Hill Road, Parsippany, NJ 07054
(Address of Insured)
this 8th day of July, 19 82. The effective date of said policy is
1st day of January, 19 82.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151(i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Elizabeth Caliendo
(Signature of Authorized Representative of Insurer)
Elizabeth Caliendo
(Type Name)
Account Supervisor Authorized Representative of Hartford Accident & Indemnity Co.
(Title) (Name of Insurer)
123 William Street New York, NY 10038
(Address of Representative)

AMENDATORY ENDORSEMENT POLLUTION LIABILITY



THE HARTFORD

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following
COMPREHENSIVE GENERAL LIABILITY INSURANCE
COMPREHENSIVE — PLUS SPECIAL GENERAL LIABILITY INSURANCE
SMP LIABILITY INSURANCE

Premium for This Endorsement Subject to Audit

Part I Separate Limits of Liability Endorsement (Hazardous Waste Facility)

It is agreed that:

1. The limits of liability stated in the Hazardous Waste Facility Pollution Liability Endorsement in Part II apply separately to such insurance as is afforded by the policy in connection with the insured's obligation to demonstrate financial responsibility at the facilities described therein.
2. Such limits of liability apply collectively to all such facilities (and not separately to each) and are in lieu of and not in addition to any other limits of liability stated elsewhere in the policy.
3. The "each occurrence" limit applies to all bodily injury and all property damage arising out of a single occurrence.
4. The annual "aggregate" limit applies to all damages because of all bodily injury and all property damage which occurs during the policy period.
5. For the purpose of determining the limit of the company's liability, all bodily injury and property damage arising out of a sudden and accidental discharge, dispersal, release or escape of irritants, contaminants or pollutants, including all bodily injury and property damage arising out of all subsequent exposure of persons or property to such substances, shall be considered as arising out of a single occurrence.
6. Part I of this endorsement shall be cancelled automatically by cancellation of the Hazardous Waste Facility Pollution Liability Endorsement in Part II.

Part II Hazardous Waste Facility Pollution Liability Endorsement

1. This endorsement certifies that the policy to which the endorsement is attached provides pollution liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA Identification Number MID 057007478
Name BASF Wyandotte Corporation - Troy
Address 1700 Blaney Drive Troy, MI 48084
for sudden accidental occurrences. The limits of liability are \$ 1,000,000 "each occurrence" and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.
2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of the Paragraph 2 are hereby amended to conform with subsections (a) through (e):
(a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
(d) Cancellation of this endorsement, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
(e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

Attached to and forming part of Policy No. 10 CLR P23903E
issued by Hartford Accident & Indemnity Company, herein called the Insurer,
(Name of Insurer) BASF Wyandotte Corporation &
of 123 William Street New York, NY 10038 to BASF Systems Corporation
(Address of Insurer) (Name of Insured)
of 100 Cherry Hill Road, Parsippany, NJ 07054
(Address of Insured)
this 8th day of July, 19 82. The effective date of said policy is
1st day of January, 19 82.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151(i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Elizabeth Caliendo
(Signature of Authorized Representative of Insurer)

Elizabeth Caliendo
(Type Name)

Account Supervisor Authorized Representative of Hartford Accident & Indemnity Co.
(Title) (Name of Insurer)

123 William Street New York, NY 10038
(Address of Representative)

AMENDATORY ENDORSEMENT POLLUTION LIABILITY



THE HARTFORD

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following
COMPREHENSIVE GENERAL LIABILITY INSURANCE
COMPREHENSIVE — PLUS SPECIAL GENERAL LIABILITY INSURANCE
SMP LIABILITY INSURANCE

Premium for This Endorsement Subject to Audit

Part I Separate Limits of Liability Endorsement (Hazardous Waste Facility)

It is agreed that:

1. The limits of liability stated in the Hazardous Waste Facility Pollution Liability Endorsement in Part II apply separately to such insurance as is afforded by the policy in connection with the insured's obligation to demonstrate financial responsibility at the facilities described therein.
2. Such limits of liability apply collectively to all such facilities (and not separately to each) and are in lieu of and not in addition to any other limits of liability stated elsewhere in the policy.
3. The "each occurrence" limit applies to all bodily injury and all property damage arising out of a single occurrence.
4. The annual "aggregate" limit applies to all damages because of all bodily injury and all property damage which occurs during the policy period.
5. For the purpose of determining the limit of the company's liability, all bodily injury and property damage arising out of a sudden and accidental discharge, dispersal, release or escape of irritants, contaminants or pollutants, including all bodily injury and property damage arising out of all subsequent exposure of persons or property to such substances, shall be considered as arising out of a single occurrence.
6. Part I of this endorsement shall be cancelled automatically by cancellation of the Hazardous Waste Facility Pollution Liability Endorsement in Part II.

Part II Hazardous Waste Facility Pollution Liability Endorsement

1. This endorsement certifies that the policy to which the endorsement is attached provides pollution liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA Identification Number MTD 064197742
Name: BASF Wyandotte Corporation - Wyandotte General (See Schedule)
Address: 1609 Biddle Avenue Wyandotte, MI 48192
for sudden accidental occurrences. The limits of liability are \$ 1,000,000
"each occurrence" and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.
2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of the Paragraph 2 are hereby amended to conform with subsections (a) through (e):
 - (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of this endorsement, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
 - (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

Attached to and forming part of Policy No. 10 CLR P23903E
issued by Hartford Accident & Indemnity Company, herein called the Insurer,
(Name of Insurer) BASF Wyandotte Corporation &
of 123 William Street New York, NY 10038 to BASF Systems Corporation
(Address of Insurer) (Name of Insured)
of 100 Cherry Hill Road, Parsippany, NJ 07054
(Address of Insured)
this 8th day of July, 19 82. The effective date of said policy is
1st day of January, 19 82.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151(i) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Elizabeth Caliendo
(Signature of Authorized Representative of Insurer)

Elizabeth Caliendo
(Type Name)

Account Supervisor Authorized Representative of Hartford Accident & Indemnity Co.
(Title) (Name of Insurer)

123 William Street New York, NY 10038
(Address of Representative)
Form L 4492-0

AMENDATORY ENDORSEMENT POLLUTION LIABILITY



THE HARTFORD

This endorsement modifies such insurance as is afforded by the provisions of the policy relating to the following
COMPREHENSIVE GENERAL LIABILITY INSURANCE
COMPREHENSIVE — PLUS SPECIAL GENERAL LIABILITY INSURANCE
SMP LIABILITY INSURANCE

Premium for This Endorsement Subject to Audit

Part I Separate Limits of Liability Endorsement (Hazardous Waste Facility)

It is agreed that:

1. The limits of liability stated in the Hazardous Waste Facility Pollution Liability Endorsement in Part II apply separately to such insurance as is afforded by the policy in connection with the insured's obligation to demonstrate financial responsibility at the facilities described therein.
2. Such limits of liability apply collectively to all such facilities (and not separately to each) and are in lieu of and not in addition to any other limits of liability stated elsewhere in the policy.
3. The "each occurrence" limit applies to all bodily injury and all property damage arising out of a single occurrence.
4. The annual "aggregate" limit applies to all damages because of all bodily injury and all property damage which occurs during the policy period.
5. For the purpose of determining the limit of the company's liability, all bodily injury and property damage arising out of a sudden and accidental discharge, dispersal, release or escape of irritants, contaminants or pollutants, including all bodily injury and property damage arising out of all subsequent exposure of persons or property to such substances, shall be considered as arising out of a single occurrence.
6. Part I of this endorsement shall be cancelled automatically by cancellation of the Hazardous Waste Facility Pollution Liability Endorsement in Part II.

Part II Hazardous Waste Facility Pollution Liability Endorsement

1. This endorsement certifies that the policy to which the endorsement is attached provides pollution liability insurance covering bodily injury and property damage in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at EPA Identification Number MID 006411953
Name: BASF Wyandotte Corporation - Holland
Address: 491 Columbia Avenue Holland, MI 49423
for sudden accidental occurrences. The limits of liability are \$ 1,000,000
"each occurrence" and \$ 2,000,000 annual aggregate, exclusive of legal defense costs.
2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy, provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of the Paragraph 2 are hereby amended to conform with subsections (a) through (e):
 - (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
 - (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of this endorsement, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.
 - (e) Any other termination of this endorsement will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrators of the EPA Regions in which the facilities are located.

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Elizabeth Caliendo
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123 William Street New York, NY 10038
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